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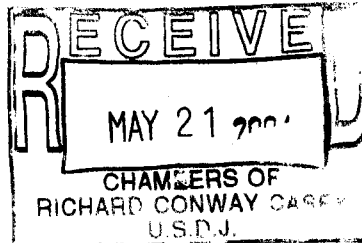
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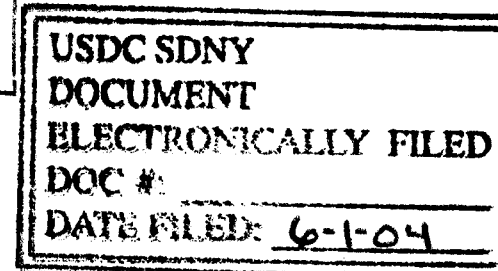
May 20, 2004

VIA FEDERAL EXPRESS

The Honorable Richard C. Casey
United States District Court for the Southern
District of New York
United States Courthouse
500 Pearl Street, Room 1950
New York, NY 10007-1312



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**Re: In Re: Terrorist Attack on September 11, 2001, MDL No. 1570
Federal Insurance Company, et al. v. al Qaida, et al. 03 CV 6978**

Dear Judge Casey:

Pursuant to stipulations entered into by counsel for the Federal Plaintiffs and counsel for Prince Salman Bin Abdulaziz Al-Saud, Prince Sultan Bin Abdulaziz Al-Saud, and Mar-Jac Poultry, Inc. respectively, each of the defendants filed Motions to Dismiss on May 10, 2004 in the above referenced action. The proposed Case Management Orders in the consolidated actions address the time in which the Plaintiffs are permitted to file responsive briefs to the outstanding Motions to Dismiss.¹ While the Plaintiffs' proposed Case Management Order requests sixty (60) days and Defendants have proposed forty-five (45) days, counsel for defendants Prince Salman Bin Abdulaziz Al-Saud, Prince Sultan Bin Abdulaziz Al-Saud, and Mar-Jac Poultry, Inc. and counsel for the Federal Plaintiffs are in agreement that the Plaintiffs are permitted a period of time in excess of the ten business days (10) permitted under the Local Rules for the Southern District of New York. Absent the entry of a Case Management Order, the Local Rules for the Southern District of New York require the Federal Plaintiffs to respond to the three outstanding Motions to Dismiss by Monday May 23, 2000.

¹ The time in which Plaintiffs are required to respond to the outstanding Motions to Dismiss filed by the defendants other than Prince Salman Bin Abdulaziz Al-Saud, Prince Sultan Bin Abdulaziz Al-Saud, and Mar-Jac Poultry, Inc. was addressed by way of stipulation, or, in the case of Prince Naif Bin Abdullaziz Al-Saud, by way of letter endorsed by Your Honor.

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The Federal Plaintiffs respectfully request that Your Honor endorse this correspondence granting Plaintiffs an extension of time in which to respond to the Motions to Dismiss filed by Prince Salman Bin Abdulaziz Al-Saud, Prince Sultan Bin Abdulaziz Al-Saud, and Mar-Jac Poultry, Inc. respectively, in accordance with the Case Management Order ultimately adopted by this Court, without regard for the time limitations prescribed by the Local Rules for the Southern District of New York.

I thank Your Honor in advance for the Court's attention to this matter.

Respectfully submitted

COZEN O'CONNOR



BY: Mark T. Mullen

MTM:jc

cc: All Counsel of Record

BY THE COURT:

 5/28/04

Richard C. Casey, J.